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September 27, 2022

BY ECF

The Honorable Katharine H. Parker, U.S.M.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 750 New York, NY 10007

RE: Cohen v. Group Health Incorporated, Case No. 1:22-mc-00200-GHW-KHP:

Dear Judge Parker:

I write regarding the above-referenced miscellaneous action concerning my Motion to Quash and to correct the statement in GHI's September 26, 2022 letter that I "backtrack[ed]" on my offer during last week's conference to produce documents that I provided to the NYAG's Office. For the avoidance of doubt, I maintain my offer to produce documents that I provided to the NYAG's Office and to present myself for deposition regarding my communications with the NYAG's office, DFS or any other regulator, if any, concerning GHI, and any evidence or information provided by me to the same. That is the offer I reiterated to GHI after the conference last week (ECF No. 25-4). My understanding is that GHI has rejected that compromise offer and instead insists on the broad list of topics contained in its September 23 email (ECF No. 25-2).

Thank you very much for your attention to this matter.

Respectfully submitted,

/s/Steve Cohen

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cc (by ECF): All Counsel of Record